

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JEANIE BISCONTE,

Plaintiff,

v.

No.

SANDIA NATIONAL LABORATORIES,
JOHN MOUNHO, in his individual and official
capacity, and EDWARD SAUCIER, in his
individual and official capacity,

Defendants.

DECLARATION OF JOHN MOUNHO

Pursuant to 28 U.S.C. § 1746, John Mounho declares as follows:

1. I am currently the Manager of Sandia's Enterprise Classified Capabilities org at National Technology & Engineering Solutions of Sandia, LLC ("Sandia").

2. I am over eighteen years of age and have personal knowledge of the statements in this Declaration.

3. I was Jeanie Bisconte's manager and direct supervisor from July 2015 until July of 2018, when Ms. Bisconte went out on medical leave.

4. While I supervised Ms. Bisconte, she worked on Oracle Financial Systems hosted on computer servers that were located in Sandia Building 880A, which is on Kirtland Air Force Base.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____ May 10 _____, 2021.

Exhibit B

John L. Mounho

Digitally signed by John L. Mounho
Date: 2021.05.10 13:37:09 -06'00'

JOHN MOUNHO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JEANIE BISCONTE,

Plaintiff,

v.

No.

SANDIA NATIONAL LABORATORIES,
JOHN MOUNHO, in his individual and official
capacity, and EDWARD SAUCIER, in his
individual and official capacity,

Defendants.

DECLARATION OF RAE LEWIS

Pursuant to 28 U.S.C. § 1746, Rae Lewis declares as follows:

1. I am currently a Medical Case Manager at National Technology and Engineering Solutions of Sandia, LLC ("Sandia").
2. I am over eighteen years of age and have personal knowledge of the statements in this Declaration.
3. In June and July of 2018, I was the Medical Case Manager for Sandia.
4. Sandia's Medical Clinic, where I and other members of Sandia's occupational health clinic worked, is on Kirtland Air Force Base.
5. On July 2, 2018, I met with Plaintiff Jeanie Bisconte, who was then an employee of Sandia, at the Sandia clinic on Kirtland Air Force Base. In that meeting on the Base, Ms. Bisconte informed me that she was completely disabled from working and requested that she be separated from Sandia because of her inability to work.

Exhibit C

6. To obtain her sickness absence plan benefits before separation, Ms. Bisconte was required to submit a signed memorandum in which she confirmed that she could not continue working at Sandia because of her medical condition(s). Ms. Bisconte provided me with a signed memorandum addressed to Sandia's Site Occupational Medical Director during our meeting on Base on July 2, 2018.

7. Ms. Bisconte was on approved paid sickness absence leave from July 2, 2018 until her paid leave benefits were exhausted and she was formally separated from Sandia effective March 15, 2019.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5/10, 2021.



RAE LEWIS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JEANIE BISCONTE,

Plaintiff,

v.

No.

SANDIA NATIONAL LABORATORIES,
JOHN MOUNHO, in his individual and official
capacity, and EDWARD SAUCIER, in his
individual and official capacity,

Defendants.

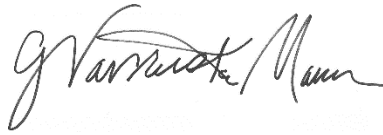
DECLARATION OF GAIL VAVRUSKA-MARCUM

Pursuant to 28 U.S.C. § 1746, Gail Vavruska-Marcum declares as follows:

1. I am currently the Senior Manager of Compensation at National Technology and Engineering Solutions of Sandia, LLC (“Sandia”).
2. I am over eighteen years of age and have personal knowledge of the statements in this Declaration.
3. I understand that Plaintiff Jeanie Bisconte was employed at Sandia from 2002 until March of 2019. Sandia’s Compensation Department, which was responsible for the compensation of all Sandia employees, was located on Kirtland Air Force Base during the entire period of Ms. Bisconte’s employment.
4. The Sandia Leadership Team is responsible for all policy-level compensation decisions at Sandia. That team meets and makes its decisions on Kirtland Air Force Base.
5. I declare under penalty of perjury that the foregoing is true and correct.

Exhibit D

Executed on Wednesday May 12th, 2021.

A handwritten signature in black ink, appearing to read "G Vavruska-Marcum". The signature is fluid and cursive, with the first name "Gail" and last name "Vavruska-Marcum" clearly distinguishable.

GAIL VAVRUSKA-MARCUM